



**Shane R. Heskin**

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January 22, 2018

Hon. Nelson S. Román  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 218  
White Plains, New York 10601

**RE: SHG of Illinois, LLC et al. v. Snap Advances; Case No. 7:17-cv-08320  
(NSR)**

Dear Judge Román:

Plaintiffs SHG of Illinois, LLC and Brian Martin respectfully write in response to Defendant Snap Advance, LLP's January 19, 2018 letter requesting leave to file a motion to dismiss or stay in favor of Snap's second-filed action in Utah. While Plaintiffs do not agree with the relief sought, Plaintiffs do agree that the issues raised by the proposed motion should be decided by this Court in the first instance. Plaintiffs therefore assent to the filing of the motion.

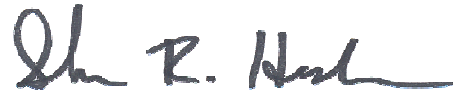
Attached for the Court's reference is Plaintiffs' pending motion to dismiss the Utah action based on the first-filed rule. We believe that this Court should determine whether this action should proceed here, in New York, where the transaction at issue occurred or whether it should be dismissed or stayed in favor of Defendant's second filed action in Utah, which has little, if any, relationship to the transaction. As explained in the attached brief in support of Plaintiffs' motion to dismiss the Utah action, Plaintiffs believe that this dispute should be resolved by this Court because, among other things, New York has a strong public policy in enforcing its criminal usury laws, and this action is more comprehensive because it includes all parties to the transaction. This action should also proceed here in New York in a single consolidated action because Plaintiffs are the victim of predatory lending practices, and thus, Plaintiffs do not have the resources to litigate in multiple forums.

We respectfully thank the Court for its consideration of this matter.

January 22, 2018  
Page 2

Respectfully submitted,

WHITE AND WILLIAMS LLP

A handwritten signature in black ink, appearing to read "Shane R. Heskin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Shane R. Heskin